

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

**INNOVATIVE GLOBAL SYSTEMS,
LLC,**

Plaintiff,

VS.

**VOLVO CONSTRUCTION
EQUIPMENT NORTH AMERICA, INC.,
VOLVO TRUCKS NORTH AMERICA,
INC., KOMATSU AMERICA CORP.,
CATERPILLAR, INC., HYUNDAI
CONSTRUCTION EQUIPMENT
AMERICAS, INC., TOPCON TIERRA,
STARTRAK SYSTEMS, LLC,
WIRELESS MATRIX USA, LLC, JLG
INDUSTRIES INC., TYLER
TECHNOLOGIES, INC., GEOTAB,
INC., and NAVISTAR, INC.,**

Defendants.

No. 6:10cv327 - LED

JURY TRIAL DEMANDED

**DEFENDANT TOPCON TIERRA'S AND PLAINTIFF INNOVATIVE GLOBAL
SYSTEMS, LLC'S AGREED MOTION TO EXTEND DEADLINE TO
COMPLY WITH P.R. 3-3 AND 3-4 AND DISCOVERY ORDER 2**

Defendant Topcon Tierra (“Topcon”) and Plaintiff Innovative Global Systems, LLC (“IGS”) file this agreed motion to extend Topcon’s deadline to comply with P.R. 3-3 and 3-4 and Discovery Order 2(B) [Docket Number 164] and any obligation of IGS to comply with Discovery Order 2(B) and (C) with respect to Topcon as follows:

Topcon requests that its deadline to comply with P.R. 3-3 and 3-4 and Discovery Order 2(B) be extended through and including February 7, 2011. IGS requests that any deadline for it to comply with Discovery Order 2(B) and (C) as to Topcon be extended through and including the same date. The purpose of this extension is to determine whether the ongoing negotiations

regarding a resolution of Plaintiff's claims can be brought to fruition. Topcon and IGS agree to the requested relief.

Dated: January 21, 2011

Respectfully submitted,

/s/ Allen F. Gardner

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(with permission by Allen F. Gardner)

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CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on January 21, 2011. Any other counsel of record will be served by First Class U.S. mail on this same date.

/s/ Allen F. Gardner

Allen F. Gardner